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October 9, 2019

US Bankruptcy Court Eastern District of Pennsylvania

900 Market St # 400

Philadelphia, PA 19107

Att: Judge Magdeline D. Coleman

RE: 17-10625-MDC

Subject – Motion seeking Sanctions for Stay Violation by John Campion

Dear Judge Coleman,

On September 18, 2019, I filed a Motion Seeking Sanctions and Damages against John Campion and JCPR LLC. A hearing is now scheduled for November 15, 2019.

Besides the regular maintenance and rental turnover duties that I must perform for the company, I find myself in the middle of the month that seasonal changes must be performed by law in the rental properties. Per a recent court order, the chapter 11 Debtor now has been directed to make space available to receive property from 839 Swede St., on October 18, 2019.

I recall my August was spent complying with court order deadlines, referencing my plan and objection filings. The first half of September was spent responding to other filings and preparing for my upcoming plan approval hearing on September 12, 2019. At that hearing I was presented with new deadlines that requirements.

Since then I have been preparing responses to discovery requests for the chapter 11 Debtor for the hearing for the Motion Seeking Sanctions and Damages against John Campion. I have been unable to timely comply with that request. After my release from prison my priority was not focused on record-keeping. I now find myself performing those duties in addition to my others. In attempting to reproduce financial records, I had to turn to our bank, which has been very slow in responding. I found out this past Saturday that the bank had been robbed twice in the last few weeks, and they are performing internal reviews and have had changes of personnel.

Unfortunately, I cannot physically accomplish everything required of me at this time without walking away from personal and company property rights. I have directed counsel for the company to seek additional time for the Chapter 11 debtor by filing a reconsideration motion of your latest order and request additional time for discovery and a rescheduled hearing for the Motion for Sanctions and Damages against Campion.

I now find myself beginning to look at preparing discovery for my personal hearing for Motion seeking Sanctions and Damages against John Campion. I need additional discovery time to procure the necessary records, witnesses and possible expert, some of which will require subpoenas, and supply opposing counsel with this information with sufficient time to prepare his defense.

Therefore I am requesting that the court grant a 30 day discovery extension and reschedule the hearing accordingly for the Motion Seeking Sanctions and Damages against John Campion.

Sincerely,

/s/ Gary Grimm

Gary Grimm

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